

Pro Se 1 2022

ELANA CAPLAN & ANGELA NGUYEN

AT WARNER MUSIC MOVE PLANS TO STEAL
RECORD LABEL MONEY AFTER SIGNING FOR

CORTEZ JONES

FORGED SIGNATURE
AT SUB POPUNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Plaintiff(s),

v.

WARNER
MUSIC ~~2020~~

Defendant(s).

CASE NO. 2:23-cv-01424-TL
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: Yes NoWONG FAMILY
ROBBED W/
WARNER MUSIC
FILED LODGEDENTERED
RECEIVED

SEP 12 2023

RE

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

I. THE PARTIES TO THIS COMPLAINT

BY

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

CORTEZ DAUNDORE JONES

SEATTLE KING COUNTY

WA 98101

Pro Se I 2022

1 B. Defendant(s)

2 *Provide the information below for each defendant named in the complaint, whether the*
3 *defendant is an individual, a government agency, an organization, or a corporation. For an*
4 *individual defendant, include the person's job or title (if known). Attach additional pages if*
needed.

4 Defendant No. 1

5 Name

6 WARNER MUSIC GROUP

7 Job or Title (if known)

8 Street Address

9 City and County

10 State and Zip Code

11 Telephone Number

12 Defendant No. 2

13 Name

14 ELANA CAPLAN

15 Job or Title (if known)

16 Street Address

17 City and County

18 State and Zip Code

19 Telephone Number

20 Defendant No. 3

21 Name

22 ANGELA CAPLAN

23 Job or Title (if known)

24 Street Address

23 City and County

24 State and Zip Code

23 Telephone Number

Pro Se 1 2022

1 Defendant No. 4

2 Name _____

3 Job or Title (*if known*) _____

4 Street Address _____

5 City and County _____

6 State and Zip Code _____

7 Telephone Number _____

II. BASIS FOR JURISDICTION

9 Federal courts are courts of limited jurisdiction (limited power). Generally, only two
10 types of cases can be heard in federal court: cases involving a federal question and cases
11 involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under
12 the United States Constitution or federal laws or treaties is a federal question case. Under 28
13 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and
14 the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of
15 citizenship case, no defendant may be a citizen of the same State as any plaintiff.

16 What is the basis for federal court jurisdiction? (*select all that apply*)

17 Federal question:

If checked complete section A.

Diversity of citizenship:

If checked complete section B.

18 Fill out the paragraphs in this section that apply to this case.

19 A. If the Basis for Jurisdiction Is a Federal Question

20 List the specific federal statutes, federal treaties, and/or provisions of the United States
21 Constitution that are at issue in this case. *Attach additional pages if needed.*

22 -470 RACKETEERING - ROBBERY VIA
23 RECORD
24 LABEL

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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) Corre~~z~~ Daundre Jones, is a citizen of the

5 State of (name) _____.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) _____, is incorporated under
8 the laws of the State of (name) _____, and has its principal
9 place of business in the State of (name) _____.

10 *(If more than one plaintiff is named in the complaint, attach an additional page providing
the same information for each additional plaintiff.)*

11
12 2. The Defendant(s)

13 a. If the defendant is an individual.

14 The defendant, (name) _____, is a citizen of the
15 State of (name) _____. Or is a citizen of
16 (foreign nation) _____.

17 b. If the defendant is a corporation.

18 The defendant, (name) WARNER MUSIC LLC, is incorporated under
19 the laws of the State of (name) _____, and has its principal
20 place of business in the State of (name) _____.

21 Or is incorporated under the laws of (foreign nation) _____,
22 and has its principal place of business in (name) _____.

23 *(If more than one defendant is named in the complaint, attach an additional page
providing the same information for each additional defendant.)*

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3. The Amount in Controversy.

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*)
Attach additional pages if needed:

476 - \$420,000,000.00
Four Hundred Twenty ^{million} _{Dollars}

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

WARNER MUSIC SIGNS MULTIPLE ARTISTS AFTER MULTIPLE PERTURBANCES WITH AMAZON

IV. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. Attach additional pages if needed.

V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
4 identified, will likely have evidentiary support after a reasonable opportunity for further
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related
8 papers may be served. I understand that my failure to keep a current address on file with the
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing:

9/12/2023

11 Signature of Plaintiff

Cody Jones

12 Printed Name of Plaintiff

COTY DAUNDINE JONES

14 Date of signing:

15 Signature of Plaintiff

16 Printed Name of Plaintiff

18 Date of signing:

19 Signature of Plaintiff

20 Printed Name of Plaintiff
